



INNER WEST COUNCIL

10 August 2018

Sally Munk
Principal Environmental Planner
NSW Department of Planning & Environment

Dear Sally,

**MODIFICATION 11 OF BORAL ST PETERS CONCRETE BATCHING PLANT AND MATERIALS HANDLING FACILITY –
DA14/96 MOD 11**

Please consider this letter Inner West Council's submission against the proposed modification of the Boral concrete batching and materials handling facility (the plant) currently under assessment by the Department of Planning and Environment. Although limited in our ability to respond within a 14 day time frame, Council appreciate the opportunity to review the proposal.

Council officers have completed a preliminary review of the information submitted and raise the following points of concerns:

Intensity of use

Concern is raised over the high level intensification of the use on site. Specifically, annual production volumes of concrete on site are proposed to increase from 280,000m³ to 750,000m³. This is a 167% increase. Flowing from this are significant changes to the operation of the site. For example the number of truck movements to and from the site is increasing by 150%, from 264 to 661.

The intensification of the use forms the basis of the majority of issues raised by Council in this submission.

Traffic generation and pedestrian and cycling safety

Increasing truck movements by 150% will have significant impacts on the function of the surrounding street network. This is in terms of safety for cyclists and pedestrians as well as congestion and additional delays. Specifically the following issues are raised:

1. Currently operating at level of service (LoS) F, the intersection of Canal Road, Burrows Road and Mary Street is expected to be further impacted, increasing from a 94.9 second to a 151.8 second AM peak delay and from a 132.4 second to a 216.8 second PM peak delay. This delay will impact on surrounding businesses including gas suppliers, engineering and fabrication companies, freight forwarders, packaging manufacturers and others. Without improvement to this intersection, this increased level of delay may prove detrimental to some of these businesses. A detailed proposal of improvements to this intersection which will limit increased delays to reasonable levels is required prior to approving the modification.
2. The intersection of Burrows Road, Burrows Road South, Canal Road and Ricketty Street currently operates at a LoS D. The proposal predicts it will operate at a LoS F with the increased vehicle movements to and from the site. This could incur delays up to 2 minutes, 30 seconds on the Burrows Road South entry to the

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intersection. This intersection therefore requires upgrading to cope with the increased traffic volumes.

3. Inconsistencies are present between the data under table 3.1 of the formal request for SEARS (dated December 2017) and table 8.4 of the Environmental Assessment (EA). In table 8.4 average truckloads are proposed at an average of 500 vehicles per day, with a maximum of 625. In contrast to table 3.1 where proposed daily truck deliveries are 638. This figure is greater than the maximum prescribed under the EA. The proponent should clarify the discrepancy.
4. It is not clear whether the proponent's SIDRA analysis is cumulative and iterative and provides feedback from one intersection's delays to the next. It is also not understood if additional traffic associated with the construction of the Westconnex M4-M5 link has been included in these calculations, as the model is based on traffic surveys taken between August 2016 and December 2017. These points must be clarified prior to proceeding with any shortfalls in the data to be updated. Additionally, the SIDRA analysis should reflect the maximum rates and not the average rates. Intersections must be assessed as their peak.
5. The 418 bus service is the only service operating in the immediately affected area, running along Canal Road through the Princes Highway, Burrows Road and Ricketty Street and Kent Street intersections. The reliability of this service, particularly during peak periods will be impacted by the lowering of service at intersections.
6. No analysis of the implications to the intersection of Ricketty Street and Kent Street has been provided. Whilst not within Inner West Council, this is considered a major intersection which will be impacted by the proposal as there are limited routes vehicles can take from the site and this being the most direct route to the eastern suburbs.
7. Significantly increased truck volumes and waiting times at intersections will impact on the safety of cyclists using Burrows Road, Ricketty Street, Canal Street and the Princes Highway. Cyclists sitting between large trucks for example waiting to cross over Canal Road to the northern or southern side of Burrows will be particularly vulnerable.
Due to this Council requests that further assessment be undertaken to determine the number of cyclists using the impacted streets, as well as proposing a plan to ensure the safety of cyclists. This may include providing cyclist slip lanes, dedicated signalling or other cycling infrastructure improvements.
8. Additional detail on anticipated delivery destinations for cement tankers and agitators is request. This will allow a more detailed consideration of haulage routes surrounding the site and the cumulative impacts this may have on sensitive land uses.
9. The road pavement on Burrows Road South is in a poor state and will need to be reconstructed to facilitate the expected increase in heavy vehicle volumes. This needs to be undertaken by the proponent at no cost to Council.

Car parking

10. Table 3.1 of the Boral report dated December 2017 notes that employee numbers will rise from 39 to 68, not including truck drivers. Parking is proposed to increase from 67 to 86 spaces for employees. Will truck

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drivers also have parking on site? Public transport in the area is relatively scarce and there is no mention of bike racks or motorcycle parking to be provided. Additionally no assessment has been made to determine if the facility will meet car, bicycle and motorcycle parking requirements set under Section 2.10 of the Marrickville DCP 2011. This should be considered and submitted for review.

Air Quality

11. Issues are raised with the increased dust created from the substantial increase in production and handling of aggregate material. Council requests that the Department investigate these impacts and ensures that adequate and best practice dust suppression measures are incorporated into Boral's operations to minimise such impacts.
12. Additional particulate matter pollution from vehicles and other operations on site are of concern to Council. Although the modelling results determine that exceeding standards for particulate matter pollution is unlikely, this has not been culminated with future particulate matter pollution resulting from the two future Westconnex ventilation stacks located on the north-west and south west corners of the St Peters interchange site.
The modelling should therefore be revised to include pollution created by both the modified facility and the Westconnex ventilation facilities on a worst case scenario basis. This must be considered in order to determine air quality standards are met for surrounding commercial and industrial workers and visitors as well as for nearby residents.

Noise

13. Concern is raised regarding the cumulative noise impacts inflicted on the nearest residential receivers along the Princes Highway and adjoining residences on the eastern end of Terry Street, Park Road, George Street and Yelverton Street, as well as the two dwellings on Bellevue Street. These residents are burdened by existing noise impacts from Princes Highway traffic, aircraft noise and other industrial noise from adjoining land uses.
Any further noise inflicted on these dwellings is considered unacceptable by Council. Exhaustive assessment should be completed by the proponent to identify any noise level increases and they should be mitigated at their origin.
14. The noise assessment has considered increased traffic and industrial noises sources created by the modification, however it has failed to consider the increased noise generated from freight trains. Increased freight trains will pass along multiple residents just as vehicle movements will and they should be considered in this assessment.

Stormwater and flooding

15. In order to adequately assess stormwater and flooding impacts, Council require the following to be submitted for review:
 - a. Being flood affected during extreme storms, the site must comply with the controls under Part 2.22 Flood Management of the Marrickville Development Control Plan (DCP) 2011. An assessment of



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compliance against the controls must be submitted to and approved by Council prior to modification of the facility. The applicant shall assess the flooding not only as described in the Alexandra Canal Flood Study 2017, but also the Cooks River Floodplain Risk Management Plan 2015.

- b. A Flood Emergency Response Plan (FERP) for the site must be submitted for review in accordance with Part 2.22 of the Marrickville DCP 2011. The FERP shall also consider evacuation and emergency response during a PMF flood. Also given the potential for pollution of the Canal during extreme storms it's imperative that adequate strategies and measures are put in place to deal with such emergencies.
- c. The Music Model must be submitted for review so a proper assessment can be made. From the information provided, it appears that only 15% of the site will drain to the bio-retention systems which would make it difficult to achieve the reduction targets of total nitrogen and total phosphorous. The stormwater treatment shall comply with Part 2.17 Water Sensitive Urban Design of the Marrickville DCP 2011.
- d. The site stormwater drainage system must comply with Part 2.25 Stormwater Management of the Marrickville DCP 2011. The piped stormwater drainage system must be designed for a minimum 20 year capacity while overland flow paths shall be designed for a 1 in 100 year capacity. All existing overland flow paths through the site from upstream catchments must be maintained. Suitable details must be provided to Council for review.

16. The following clearances from flood planning levels must be made on site:

- a. All floor levels of new buildings and structures such as silos must be set at or above 1% AEP Flood Level plus 500mm freeboard.
- b. All electrical equipment and wiring shall be waterproofed or installed at or above 1% AEP Flood Level plus 500mm freeboard.
- c. All structures on site must be designed to withstand the forces of flood water, impact from debris and buoyancy up to the PMF flood level.

17. A positive covenant should be imposed on the title ensuring the maintenance of all elements of the stormwater drainage and treatment system.

Alexandra Canal heritage value

18. Consideration must be given to the impact that new construction activity and increased operation may have on the Alexandra Canal, which is listed as a state significant heritage item. This may include potential flooding and water management issues that could damage the canal.



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Council recommends that if approved, all conditions of consent are reviewed and updated to reflect the modified operations on site. Conditions should reflect maximum truck and freight movements, material output, updated site plans, operational noise limitations, hours of use, staffing levels and other operational parameters.

Council requests that should the Department be of a mind to support the application, that Council be provided with an opportunity to review the proposed conditions of any modified consent prior to that consent being finalised.

Should you have further enquiries please contact Council's officer Jarrad Sheather on 9392 5210 or via e-mail at jarrad.sheather@innerwest.nsw.gov.au.

Yours sincerely,

Gill Dawson

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